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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual;

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability

Case No.: 2:23-cv-00482-RJS

DECLARATION OF MICHAEL E.
WELSH IN SUPPORT OF PLAINTIFF’S
MOTION FOR ALTERNATE SERVICE
AND EXTENSION OF TIME FOR
SERVICE OF PROCESS

company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRITZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

I, Michael E. Welsh, do hereby declare, under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the following is true and correct to the best of my belief and, further, that this declaration is made on my personal knowledge, and that I am competent to testify as to the matters herein stated.

1. I am presently employed as a trial attorney in the Division of Enforcement by the United States Securities and Exchange Commission (the “Commission”) working from the Commission’s Salt Lake Regional Office located at 351 South West Temple, Suite 6.100, Salt Lake City, Utah, 84101. Along with my co-counsel Casey Fronk and Troy Flake, I am counsel of record for the Commission in the above-captioned matter. As counsel representing the Commission, I reviewed the Commission’s files and correspondence in this matter. Based upon these and other activities, I am informed and therefore state the information set forth in paragraphs 2 through 5 below.

2. Attached hereto as **Exhibit A** is a true and correct copy of email correspondence with Sean Prosser regarding Defendant James Franklin from August 3 and 4, 2023.

3. On or about August 4, 2023, I spoke with Sean Prosser by phone, and he indicated that he had spoken to Mr. Franklin about the Complaint.

4. Attached hereto as **Exhibit B** is a true and correct copy of an August 4, 2023, email correspondence (without attachments) with Sean Prosser regarding waiver of service.

5. Despite several follow up attempts, I have not received any response to my August 4, 2023, email to Mr. Prosser.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 15, 2023

/s/ Michael E. Welsh

MICHAEL E. WELSH

*Attorney for Plaintiff
Securities and Exchange Commission*